

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

*In re*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

*In re*

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING  
CORPORATION ("COFINA"),

Debtor.

PROMESA  
Title III

No. 17 BK 3284-LTS

Related to Debtor COFINA Only

**APPLICATION OF MATTHEW L. BROD  
FOR ADMISSION PRO HAC VICE**

**TO THE HONORABLE COURT:**

**COMES NOW Matthew L. Brod, Esq.** (the "Applicant") and respectfully requests *pro hac vice* admission to this Court, by stating as follows:

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

**Application of Matthew L. Brod to Appear *Pro Hac Vice***  
In re Commonwealth of Puerto Rico  
Civil No. 17-bk-3283-LTS  
Page 2 of 4

---

1. Applicant is an attorney and a Partner with the law firm Milbank, Tweed, Hadley & McCloy LLP with offices at:

<b>Address</b>	:	28 Liberty Street New York, NY 10005-1413
<b>E-Mail</b>	:	MBrod@milbank.com
<b>Telephone</b>	:	(212) 530-5460
<b>Fax</b>	:	(212) 822-5460

2. Applicant will sign all pleadings with the name Matthew L. Brod.

3. Applicant does not reside in the Commonwealth of Puerto Rico.

4. Applicant has been retained as counsel by party Ambac Assurance Corporation ("Ambac"), to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the District of Puerto Rico.

5. Since 2011, Applicant has been and presently is a member in good standing of the bar of the highest court of the State of New York, where Applicant regularly practices law. Applicant's bar license number is 4873253.

6. Applicant has also been admitted to practice before the following courts where he remains as a member in good standing:

<u>Court:</u>	<u>Admission Date:</u>
US District Court for the Southern District of New York	2011
US District Court for the Eastern District of New York	2011

7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.

8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding or criminal charges before any court or jurisdiction.

9. During the past three years, Applicant has not filed for *pro hac vice* admission in the United States District Court for the District of Puerto Rico.

**Application of Matthew L. Brod to Appear *Pro Hac Vice***  
In re Commonwealth of Puerto Rico  
Civil No. 17-bk-3283-LTS  
Page 3 of 4

---

10. Local counsel of record associated with Applicant in this matter is:

<b>Name</b>	:	Roberto A. Cámara-Fuertes
<b>USDC-PR Bar No.</b>	:	219002
<b>Email</b>	:	rcamara@ferriaioli.com
<b>Address</b>	:	P.O. Box 195168 San Juan, PR 00919-5168
<b>Telephone No.</b>	:	(787) 776-7000 x 366
<b>Fax No.</b>	:	(787) 776-7001

11. Applicant has been furnished a copy of, and has read, the Local Rules of the United States District Court for the District of Puerto Rico<sup>2</sup> and agrees to comply with them in their entirety.

12. Applicant is further aware that such rules provide in part that attorneys appearing *pro hac vice* must pay an admission fee of \$300 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee shall be completed either through the CM/ECF payment module (using the pay.gov portal) or by attaching a check or money order payable to "Clerk, U.S. District Court."

**WHEREFORE**, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled cases only.

In New York, New York, this 10th day of January, 2019.

  
Matthew L. Brod

---

<sup>2</sup> Latest version (with amendments through April 12, 2018) available at [http://www.prd.uscourts.gov/sites/default/files/documents/94/Local\\_Rules\\_amended\\_as\\_of\\_Sept\\_2\\_2010\\_with\\_TOC.pdf](http://www.prd.uscourts.gov/sites/default/files/documents/94/Local_Rules_amended_as_of_Sept_2_2010_with_TOC.pdf).

**Application of Matthew L. Brod to Appear *Pro Hac Vice***

In re Commonwealth of Puerto Rico

Civil No. 17-bk-3283-LTS

Page 4 of 4

---

I HEREBY CERTIFY that I consent to the designation of local counsel of record for all purposes pursuant to Local Rule 83.1(f).

In San Juan, Puerto Rico, this 10th day of January, 2019.

*s/ Roberto A. Cámara-Fuertes*

Roberto A. Cámara-Fuertes

USDC-PR No. 219002

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notification of such filing to all CM/ECF Participants.

In San Juan, Puerto Rico, this 10th day of January, 2019.

**Ferraiuoli** LLC

PO Box 195168

San Juan, PR 00919-5168

Phone: 787.766.7000

Fax: 787.766.7001

**s/ Roberto A. Cámara Fuertes**

Roberto A. Cámara Fuertes

USDC-PR 219002

Email: rcamara@ferraiuoli.com